

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION : 21 MC 101 (AKH)
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This Document Relates to:
Bavis v. United Air Lines, Inc.,
(02 Civ 7154)

DECLARATION OF MICHAEL R. FEAGLEY

I, MICHAEL R. FEAGLEY, declare as follows:

1. I am admitted to practice before this Court, and I am a member of the law firm of Mayer Brown LLP, co-counsel for defendant United Air Lines, Inc. (“United”). I have participated in the defense of this litigation since its inception and am fully familiar with all prior pleadings and proceedings.
2. I submit this declaration in support of United’s Opposition to Plaintiff’s Motion to Charge Res Ipsa Loquitur Against United.
3. Attached as Exhibit “A” is a true and correct copy of selected pages of The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks Upon the United States (“9/11 Report”).
4. Attached as Exhibit “B” is a true and correct copy of the National Commission on Terrorist Attacks Upon the United States Staff Statement No. 3.
5. Attached as Exhibit “C” is a true and correct copy of the National Commission on Terrorist Attacks Upon the United States Staff Statement No. 4.
6. Attached as Exhibit “D” is a true and correct copy of selected pages of the transcript of the January 7, 2011 deposition of Lyle Malotky, Ph.D.

7. Attached as Exhibit "E" is a true and correct copy of selected pages of the transcript of the February 11-12, 2008 deposition of Robert J. Cammaroto.

8. Attached as Exhibit "F" is a true and correct copy of selected pages of the transcript of the April 19, 2007 deposition of William J. Bourque.

9. Attached as Exhibit "G" is a true and correct copy of selected pages of the transcript of the February 22, 2007 deposition of Simon J. Robinson.

10. Attached as Exhibit "H" is a true and correct copy of selected pages of the transcript of the January 27, 2009 deposition of Denise Roussin.

11. Attached as Exhibit "I" is a true and correct copy of selected pages of the transcript of the January 27, 2011 deposition of Frances Lozito.

12. Attached as Exhibit "J" is a true and correct copy of selected pages of the transcript of the January 28, 2011 deposition of Stephen P. Jenkins.

13. Attached as Exhibit "K" is a true and correct copy of selected pages of United's Air Carrier Standard Security Program ("ACSSP") in place on September 11, 2001.

14. Attached as Exhibit "L" is a true and correct copy of selected pages of the transcript of the August 6, 2008 deposition of Lawrence N. Slate.

15. Attached as Exhibit "M" is a true and correct copy of selected pages of the transcript of the June 9-10, 2009 deposition of Claudio Manno.

16. Attached as Exhibit "N" is a true and correct copy of an April 10, 1991 Federal Aviation Administration memorandum regarding the testing of metal detectors, produced as TSA 11704-05.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on July 8, 2011, in Chicago, Illinois.



The image shows a handwritten signature in black ink, which appears to read "Michael R. Feagley". The signature is fluid and cursive. Below the signature, the name "Michael R. Feagley" is printed in a smaller, more formal font, enclosed within a thin horizontal line.